1 2 3 4 5 6	BATHAEE DUNNE LLP Yavar Bathaee (CA 282388) yavar@bathaeedunne.com Andrew C. Wolinsky (CA 345965) awolinsky@bathaeedunne.com 445 Park Avenue, 9th Floor New York, NY 10022 (332) 322-8835	SCOTT+SCOTT ATTORNEYS AT LAW LLP Amanda F. Lawrence (pro hac vice) alawrence@scott-scott.com Patrick J. McGahan (pro hac vice) pmcgahan@scott-scott.com Michael P. Srodoski (pro hac vice) msrodoski@scott-scott.com 156 South Main Street, P.O. Box 192 Colchester, CT 06415 Tel.: (860) 537-5537	
7 8	Brian J. Dunne (CA 275689) bdunne@bathaeedunne.com Edward M. Grauman (pro hac vice) egrauman@bathaeedunne.com 901 S. MoPac Expressway	Patrick J. Coughlin (CA 111070) pcoughlin@scott-scott.com Carmen A. Medici (CA 248417) cmedici@scott-scott.com Hal D. Cunningham (CA 243048)	
9 10 11	Barton Oaks Plaza I, Suite 300 Austin, TX 78746 (213) 462-2772	hcunningham@scott-scott.com Daniel J. Brockwell (CA 335983) dbrockwell@scott-scott.com 600 W. Broadway, Suite 3300 San Diego, CA 92101	
12	Interim Co-Lead Counsel for the Advertiser Classes	Tel.: (619) 233-4565 (Additional counsel on signature page)	
13		(Traditional counsel on signature page)	
14	UNITED STATES DISTRICT COURT		
15	NORTHERN DISTRICT OF CALIFORNIA		
16	SAN FRANCISCO DIVISION		
17	MAXIMILIAN KLEIN, et al.,	Case No. 20-cv-08570-JD	
18	Plaintiffs,	Hon. James Donato	
19	v.	ADVERTISER PLAINTIFFS'	
20	META PLATFORMS, INC.,	ADMINISTRATIVE MOTION TO CONSIDER WHETHER META	
21	Defendant.	PLATFORMS, INC.'S MATERIAL SHOULD BE SEALED	
22			
23			
24			
25			
26			
27			
28	Advertiser Plaintiffs' Administrative Motion to Consider Whether		

1	Pursuant to Civil Local Rule 79-5(f), Adverti	ser Plaintiffs hereby file this Administrative	
2	Motion to Consider Whether Meta Platforms, In	c.'s Material Should Be Sealed. Per the	
3	accompanying Declaration of Brian J. Dunne, certain documents and information referenced in the		
4	concurrently filed discovery dispute letter have been designated by Defendant Meta Platforms, Inc.,		
5	as "Confidential" or "Highly Confidential" under the Stipulated Protective Order (Dkt. No. 314).		
6	Portions of the discovery dispute letter referencing or reflecting the contents of the designated-		
7	as-confidential documents and information have been redacted from the publicly filed version of the		
8	letter, and an unredacted version of the letter with the information designated "Confidential" or		
9	"Highly Confidential" by Meta Platforms highlighted in yellow is filed herewith. See Civ. L.R. 79-		
0		in yenow is fired herewith. See Civ. L.R. 79-	
	5(e), (f)(1).		
1	Advertiser Plaintiffs respectfully request that the Court grant their motion to consider whether		
2	the above-referenced Meta Platforms material should be	pe sealed.	
3			
4	Dated: May 31, 2023	Respectfully submitted,	
5		By: /s/ Brian J. Dunne	
6	SCOTT+SCOTT ATTORNEYS AT LAW LLP	BATHAEE DUNNE LLP	
17 18 19 20 21	Amanda F. Lawrence (pro hac vice) alawrence@scott-scott.com Patrick J. McGahan (pro hac vice) pmcgahan@scott-scott.com Michael P. Srodoski (pro hac vice) msrodoski@scott-scott.com 156 South Main Street, P.O. Box 192 Colchester, CT 06415 Tel.: (860) 537-5537	Yavar Bathaee (CA 282388) yavar@bathaeedunne.com Andrew C. Wolinsky (CA 345965) awolinsky@bathaeedunne.com Adam Ernette (pro hac vice) aernette@bathaeedunne.com Priscilla Ghita (pro hac vice) pghita@bathaeedunne.com	
22 23 24	Patrick J. Coughlin (CA 111070) pcoughlin@scott-scott.com Carmen A. Medici (CA 248417) cmedici@scott-scott.com Hal D. Cunningham (CA 243048) hcunningham@scott-scott.com	Chang Hahn (pro hac vice) chahn@bathaeedunne.com 445 Park Avenue, 9th Floor New York, NY 10022 (332) 322-8835	
25 26 27	Daniel J. Brockwell (CA 335983) dbrockwell@scott-scott.com 600 W. Broadway, Suite 3300 San Diego, CA 92101 Tel.: (619) 233-4565	Brian J. Dunne (CA 275689) bdunne@bathaeedunne.com Edward M. Grauman (<i>pro hac vice</i>) egrauman@bathaeedunne.com Andrew M. Williamson (CA 344695)	

28

Case 3:20-cv-08570-JD Document 569 Filed 05/31/23 Page 3 of 3

1 2 3	Patrick J. Rodriguez (<i>pro hac vice</i>) prodriguez@scott-scott.com 230 Park Avenue, 17th Floor New York, NY 10169 Tel.: (212) 223-6444	awilliamson@bathaeedunne.com 901 S. MoPac Expressway Barton Oaks Plaza I, Suite 300 Austin, TX 78746 (213) 462-2772
4	Interim Co-Lead Counsel and Executive Committee	Allison Watson Cross (CA 328596)
5	for the Advertiser Classes	across@bathaeedunne.com 3420 Bristol St., Ste 600 Costa Mesa, CA 92626-7133
6		LEVIN SEDRAN & BERMAN LLP
7		Keith J. Verrier (pro hac vice)
8 9		Austin B. Cohen (<i>pro hac vice</i>) 510 Walnut Street, Suite 500 Philadelphia, PA 19106-3997
10		Tel.: (215) 592-1500 Fax: (215) 592-4663 kverrier@lfsblaw.com
11		acohen@lfsblaw.com
12		AHDOOT & WOLFSON, PC
13		Tina Wolfson (CA 174806) Robert Ahdoot (CA 172098)
14		Theodore W. Maya (CA 223242) Henry J. Kelston (pro hac vice)
15		2600 West Olive Avenue, Suite 500 Burbank, CA 91505
16		Telephone: (310) 474-9111 Facsimile: (310) 474-8585
17		twolfson@ahdootwolfson.com rahdoot@ahdootwolfson.com
18		tmaya@ahdootwolfson.com
19		
20		
21		
22		
23		
24		
25		
26		
27		
28	2	
		f